

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

In re:

Julia Roach,

Debtor

Chapter 13

Case No.: 21-12963

CERTIFICATION OF DEFAULT

NOW COMES the Movant, Carrington Mortgage Services, LLC, servicer for Wilmington Savings Fund Society, FSB, as Trustee of Stanwich Mortgage Loan Trust F (“Movant”), by and through its attorneys, Hill Wallack LLP, who file this Certification of Default upon the following:

1. A Motion for Relief from Stay was filed by Movant on January 26, 2022 at Document No. 23.
2. Debtor thereafter filed an objection to the Motion for Relief from Stay on February 1, 2022 at Document No. 25.
3. On or about March 10, 2022, the Debtor and Movant entered into a certain Stipulation in Settlement of the Motion for Relief from Stay wherein the Debtor agreed to remain current on all regular post-petition monthly mortgage payments commencing March 1, 2022. A true and correct copy of the Stipulation is attached hereto and made a part hereof as Exhibit “A.”
4. On or about March 14, 2022, the Court entered an Order approving the Stipulation at Document No. 32.

5. The Stipulation provided that should the monthly payments not be remitted within fifteen (15) of the date due, Movant shall send Debtor, and Debtor's counsel a written Notice of Default of the Stipulation. If the default is not cured within fifteen (15) days of the date of the Notice, counsel shall file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay, waiving FED. R. Bankr. P. 3002.1 and waiving Rule 4001 (a)(3) so that the Relief Order is immediately effective and enforceable. *See* Stipulation at ¶ 6.
6. The Debtor failed to make the payments required under the Stipulation beginning with the payment due on February 1, 2023.
7. A Notice of Default was sent to Debtor and Debtor's counsel on April 10, 2023. A true and correct copy of letter dated April 10, 2023 is attached hereto as Exhibit "B."
8. As of May 4, 2023, the Debtor has failed to bring said post-petition arrears current such that the Debtor remains in default under the Stipulation. More specifically, Debtor's account is past due for the payments due from March 1, 2023 through May 1, 2023 in the amount of \$3,522.24, less suspense in the amount of \$549.52, for a total of \$2,972.72.
9. As such, Movant respectfully requests that the attached Order in connection with the Motion for Relief from Stay and Co-Debtor Stay be entered.

Hill Wallack LLP

By: /s/ Angela C. Pattison

Angela C. Pattison, Esq.,

Attorney ID 307611

Hill Wallack, LLP

1415 Route 70 East, Suite 309

Cherry Hill, NJ 08034

Telephone 856-616-8086

Facsimile 856-616-8081

Email: apattison@hillwallack.com